

**Handman, Laura**

---

**From:** Michael Flynn <mike@mjfesq.com>  
**Sent:** Thursday, September 03, 2015 1:03 PM  
**To:** Handman, Laura  
**Subject:** Re: Montgomery v. Risen

Laura.

1. I have not been served with any subpoena. And have no notice.
2. I am traveling September 4 thru 12.
3. I am out of the country from Sept 12 thru 30.
4. First available dates are in Dec.

Mike.

On Sep 3, 2015 7:44 AM, "Handman, Laura" <[laurahandman@dwt.com](mailto:laurahandman@dwt.com)> wrote:

Dear Mr. Flynn:

As you know, I am representing the defendants, author Jim Risen and his book publisher, in the libel action brought by Dennis Montgomery. Could you or your lawyer, if you have a lawyer acting for you in this matter, please call me in my D.C. office 202 973 4224 about the subpoena for your deposition served by Plaintiff Montgomery that had been scheduled for September 14.

We have advised Plaintiff's counsel that the 14<sup>th</sup> and 15<sup>th</sup> are Rosh Hashanah and therefore we cannot attend. We have suggested to Plaintiff's counsel alternative dates of Sept. 9, 10 or 11 subject, of course, to your availability.

Laura Handman

**Laura R. Handman | Davis Wright Tremaine LLP**  
1919 Pennsylvania Avenue NW, Suite 800 | Washington, DC 20006-3401  
Tel: (202) 973-4224 | Fax: (202) 973-4499  
and  
1251 Avenue of the Americas, 21<sup>st</sup> Floor | New York, NY 10020-1104  
Tel: (212) 489-8230 | Fax: (212) 489-8340  
Email: [laurahandman@dwt.com](mailto:laurahandman@dwt.com) | Website: [www.dwt.com](http://www.dwt.com)  
Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | Seattle | Shanghai | Washington, D.C.